



SAFEGUARDING BOARD
ISLE OF MAN

Managing Allegations against a person working with Children and Vulnerable Adults – MASM Policy

Isle of Man Safeguarding Board
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Managing Allegations against a person working with Children and Vulnerable Adults - MASM

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1. Introduction and Criteria

This combined children and vulnerable adults' inter-agency procedure provides information to support the management of allegations against staff who have contact with children, young people and vulnerable adults in their work (paid or voluntary). It will assist practitioners from all organisations to understand the process and actions that should be progressed, within specified timescales, in situations where an allegation is made about the conduct of a person which raises a safeguarding concern.

All allegations of concern or abuse against children or vulnerable adults by those who work with them must be taken seriously by agencies who work together, taking a coordinated approach to investigate, share information and make decisions in the child's or vulnerable adult's best interests, ensuring that effective safeguarding arrangements are in place whilst doing so.

To be procedurally compliant, each organisation should have their own policy and procedure regarding how allegations against staff will be managed, which should be compatible with this procedure. This will have clear guidelines and timescales set out to support practitioners in what steps to take when an allegation about a member of staff or a volunteer is made. All agencies, third and private sector services should maintain their safeguarding responsibilities set out in the Safeguarding Act 2018 when working collaboratively through the MASM process

and should at all times cooperate and promote the welfare of children and vulnerable adults

A Managing Allegations Strategy Meeting (MASM) will initially be convened to oversee the process of the initial investigations into the allegation, that may potentially be carried out by the Employer, the Police, Children and Families Division and/or the Adult Safeguarding Team. The disciplinary process should be discussed and considered within the process. The final outcome MASM meeting will be convened once investigations have concluded to reach an overall decision in response to the allegation and what further actions are required.

The Designated Officers within Manx Care, Children and Families Division and Adult Social Care are responsible for managing and having full oversight of all MASMs and to be procedurally compliant should at all times work within this policy. Other experienced officers within both services will assist with the chairing of MASM meetings when required at the discretion of the Designated Officer. – [See Section 2 Roles and Responsibilities for additional information.](#)

For the purpose of this policy ‘Children’ includes anyone who has not yet reached their 18th Birthday. Allegations pertaining to a child will be managed through the MASM process by the Designated Officer within the Safeguarding and Quality Assurance Unit, Children and Families Division.

‘Vulnerable adult’ is a person who has attained the age of 18 years and is in need of care and protection, and satisfies one or more of the conditions of subsection (2) within section (5) of the Safeguarding Act 2018. Allegations pertaining to vulnerable adults will be managed through the MASM process by the Designated Officer within Adult Social Care.

- **Criteria**

A useful test for deciding upon the applicability of this procedure is to consider whether the person occupies **a position of authority and/or trust**. Potentially there are many scenarios whereby a small number of adults may seek through their work activity to actively exploit their position of power and trust to abuse children or vulnerable adults.

Allegations against any person who works with children or vulnerable adults, whether in a paid or unpaid capacity, can cover a wide range of circumstances.

The procedure to manage an allegation should be applied when there is an allegation or concern that a person has:

- Behaved in a way that has harmed a child or vulnerable adult, or may have done so;
- Possibly committed a criminal offence against or related to a child or vulnerable adult;

- Behaved in a way that indicates he or she may pose a risk of harm to children or vulnerable adults;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable adults.

The concerns should be considered within the context of the four categories of abuse (for example, physical, sexual and emotional abuse and neglect). For vulnerable adults there are additional abuse categories (see **Categories of Adult Abuse**)

These will include concerns relating to inappropriate relationships between members of staff and children, young people or vulnerable adults, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see [Sexual Offences Act 1992](#));
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see [Sexual Offences Act 1992](#));
- Other 'grooming' behaviour giving rise to concerns (for example, inappropriate text / e-mail messages or images, gifts, socialising etc.);
- Possession of indecent photographs / pseudo-photographs of children.
- A professional smacking, hitting or causing purposeful physical harm or discomfort to a child or vulnerable adult.

The criteria are notably wider than that which relates to the 'reasonable cause to believe a child or vulnerable adult is suffering or likely to suffer harm'

The notion of unsuitability to work with children and vulnerable adults is complex and currently has no statutory defined parameters. It may relate to a specific act, an accumulation of concerns, or behaviours outside of work which are judged incompatible with the 'work' role.

If concerns arise about the person's behaviour in relation to their own children or a vulnerable adult they personally care for, the Police and/or the Children and Families Division or Adult Social Care must consider informing the employer / organisation in order to assess whether there may be implications for those with whom the person has contact at work / in the organisation, in which case this procedure will apply.

Allegations of non-recent abuse should be responded to in the same way as contemporary concerns. In such cases, it is important to find out whether the person against whom the allegation is made is still working with children or vulnerable adults. If this is the case a MASM will be convened.

All references in this document to 'staff or members of staff' should be interpreted as meaning all paid or unpaid staff / professionals and volunteers, some examples are:

- Foster carers;
- Staff within residential environments, and community resources;
- Prospective adopters, child minders;
- Those working within health and educational settings and supply staff.
- Youth Workers

This chapter also applies to any person, who manages or facilitates access to an establishment where children and vulnerable adults are present.

2. Roles and Responsibilities

Organisations and agencies working with children and vulnerable adults should identify a named senior officer within the agency with overall responsibility for:

- Ensuring that the organisation deals with allegations in accordance with this procedure;
- Resolving any inter-agency issues

Employers should appoint:

- A designated senior manager to whom allegations or concerns should be reported;
- A deputy to whom reports should be made in the absence of the designated senior manager or where that person is the subject of the allegation or concern.

The Children and Families Division and Adult Social Care (Manx Care) have assigned Designated Officers to:

- Receive reports in relation to allegations and to be involved in the coordination and oversight of individual cases;
- Provide advice and guidance to employers, voluntary organisations and agencies;
- Liaise with the police and other agencies;
- Monitor the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process;
- Provide advice and guidance to employers in relation to making referrals to the Disclosure and Barring Service (DBS) and regulatory bodies such as Social Work England and the GMC etc.

If it is identified that the permanent residence of the MASM subject is in the UK, there will be a need for the Designated Officer to liaise with the relevant Local Authority Designated Officer for the area they reside and roles and responsibilities in respect of the MASM will be agreed between the two.

There should be no avoidance with referring an individual to a regulatory body due to issues of Jurisdiction. The Designated Officer should advise employers how/when to refer a person to the appropriate regulatory bodies.

National UK regulatory bodies are unlikely to be present at a MASM meeting but may need to be informed of the investigation and the final outcome, according to the findings.

The police officer who responds to allegations will inform the Sergeant or Inspector within MAPPU immediately of the allegation. The Sergeant or Inspector will then:

- Have strategic oversight of the local police arrangements for managing allegations against staff and volunteers;
- Ensure compliance with these procedures.
- Liaise with the designated officer;
- Take part in strategy meetings/discussions, MASM;
- Review the progress of cases in which there is a police investigation;
- Share information as appropriate, on completion of an investigation or related prosecution.

The attendees of a MASM must have sufficient seniority and accountability within their agency, to make informed decisions within the process.

3. General Considerations Relating to Allegations Against Staff

Persons to be notified

The employer must make a referral to the Children and Families Division and should inform the designated officer within **1 working day** once the allegation has been made. **At no time should the employer pursue their own investigation.**

The parent/s and the child, or vulnerable adult (if they have the capacity), should be helped to understand the processes involved and be kept informed about the progress of the case and of the outcome where there is no criminal prosecution.

The employer should seek advice from the Designated Officer, the police and /or Children and Families Division or Adult Social Care about how much information should be disclosed to the accused person.

Subject to restrictions on the information that can be shared, the employer should, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the potential outcomes.

Internal processes should be transparent and inclusive for the person involved. If an allegation is made which concerns the actions of a professional, or volunteer which related to the alleged abuse and this amounts to a safeguarding enquiry then such an allegation should be dealt with by adhering to the multi-agency safeguarding adult's policies and procedures which provides guidance as to how safeguarding enquiries should be undertaken.

The accused member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Be kept informed of the progress and outcome of any investigation as per the relevant HR processes
- If suspended, be kept up to date about events in the workplace.

A representative from the Registration and Inspection Unit DHSC may attend in respect of an employing agency that has to be compliant with regulations and minimum standards. Their role in the MASM is that of observer only to gather information to fulfil their regulatory role.

The Children and Families Division or Adult Social Care and the employer should inform Registrations and Inspections of all allegations made against a foster carer, childminder, or member of staff in a residential child/adult care facility.

The Safeguarding Board is responsible for ensuring there are effective inter agency procedures in place for dealing with allegations and would need to be advised if any organisation refused to be compliant with the procedure and were leaving children/adults at risk/ vulnerable to abuse. The [Resolving Professional Differences Procedure](#) should be followed where such matters come to light and cannot be resolved by utilising the 4 stages of escalation.

4. Confidentiality

General Data Protection Regulations (GDPR) and Caldicott Guidance is not a barrier to sharing information but provides a framework to ensure that the

personal information about a person should be shared appropriately. Any recording within the MASM process must be compliant with the principles of the GDPR.

Decisions on sharing information must be justifiable and proportionate, based on the potential or actual harm to adults or children and risk. The rationale for decision making should always be recorded. When sharing information about children and adults at risk it should only be shared:

- Where there is justification for doing so;
- Where relevant and necessary, and not simply all of the information held;
- With relevant people who need all or some of the information;
- When there is a specific need for the information to be shared at that time

[See Information Guidance and Confidentiality Protocol](#)

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents, vulnerable adult and accused person (where this would not place the child or vulnerable adult at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children and vulnerable adults, facilitate enquiries, and manage related disciplinary or suitability processes.

The police should not provide identifying information to the press or media, unless and until a person is charged, except in exceptional circumstances, for example an appeal to trace a suspect). In such cases, the reasons should be documented and partner agencies consulted beforehand.

The MASM such consider any likely media interest and how confidentiality will be managed.

If the MASM is substantiated, the minutes of the MASM will be provided to the employer and the police for their records. They will not be distributed as standard if there is any other outcome to the MASM and will be held by the Designated Officer who will review any requests for the minutes.

Professionals are advised that the minutes may be shared with the subject of the meeting but should be formally be requested under Subject Access Regulations. If appropriate a redacted version of the minutes will be provided. The process of redactions enables any exemptions to be considered and that is why automatic provision to the subject is not appropriate.

A redacted version of the minutes will be provided to the Disclosure and Barring Service (DBS) if it is agreed that the matter meets the criteria for the referral at the end of the allegations process, or if the DBS request them.

Support to individuals involved in the MASM

The MASM should consider the impact on the child or vulnerable adult concerned and agreed services and support as determined through the enquiries/assessments undertaken.

Sharing information is crucial if there is to be a full understanding of the overall impact of what the child or vulnerable adult has experienced. It is only then that appropriate support and services can be arranged to meet specific needs. All practitioners should adhere to the Information Sharing Protocol.

As soon as possible after an allegation has been received, the accused member of staff should be advised to contact their union or professional association. Human resources should be consulted at the earliest opportunity in order that appropriate support can be provided via the organisation's occupational health or employee welfare arrangements. The MASM should identify a named support person from the individual's employer who will be available to them during the MASM process to explain the process and the MASM chair will name this individual, and signpost them to any identified support agencies (e.g. occupational health; staff welfare services), in their letter to the MASM subject following the initial meeting.

5. Initial Response to an Allegation or Concern

An allegation against a member of staff may arise from a number of sources, for example, a report from a child, a vulnerable adult, a concern raised by another adult in the organisation, or a complaint by a parent or carer. It may also arise in the context of the member of staff and their life outside work or at home.

Information may also come to light from a child protection/adult safeguarding inquiry by the Police and or the Division of Children and Families/Adult Social Care may identify an adult within the children's or adult's workforce about whom there are concerns, or either agency may be contacted anonymously or by a member of the public.

Professionals may also use whistle-blowing within their service to highlight their concerns about an adult within their own or another organisation.

It is important that at the point of notifying an allegation or concern all information relevant to the matter is available to assist an evaluation.

Initial action by person receiving or identifying an allegation or concern

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind.

They should not:

- Investigate or ask leading questions if seeking clarification;
- Make assumptions or offer alternative explanations;
- Promise confidentiality, but give assurance that the information will only be shared on a 'need to know' basis.

They should:

- Make a written record of the information where possible in the child / vulnerable adult's own words, also taking into account what the person who is subject to the allegation is saying including the time, date and place of incident/s, persons present and what was said;
- Sign and date the written record;
- Immediately report the matter to the designated senior manager, or the deputy in their absence or; where the designated senior manager is the subject of the allegation report to the deputy or other appropriate senior manager.

Initial action by the designated senior manager

When informed of a concern or allegation, the designated senior manager should not investigate the matter or interview the member of staff, child or vulnerable adult concerned or potential witnesses.

They should:

- Obtain written details of the concern / allegation, signed and dated by the person reporting the allegation (not the child / adult making the allegation);
- Approve and date the written details;
- Record any information about times, dates and location of incident/s and names of any potential witnesses.

Record discussions about the child/vulnerable adult and/or member of staff, any decisions made, and the reasons for those decisions.

The designated senior manager should initially report the allegation to the Initial Response Team, Children and Families Division, or Adult Social care in the case of a vulnerable adult within **1 working day** as per the Safeguarding Board's referral procedure.

[See Appendix 1 for the Referral Form for Children and Families](#)

[See Appendix 2 for the Referral Form for Adult Social Care](#)

Referrals should not be delayed in order to gather information and a failure to report an allegation, where a child or vulnerable adult is at risk or has potentially been harmed in accordance with procedures is potentially a disciplinary matter.

If an allegation requires immediate attention, but is received outside normal office hours, the designated senior manager should consult the Out of hours duty team.

If a police officer receives an allegation, they should, without delay, report it to the Initial Response Team, Children and Families Division or Adult Social Care.

Should the Senior Manager (employer) initially contact the Designated Officer to establish whether the threshold criteria are met for an investigation the Designated Officer must emphasise to the employer the importance of notifying the Children and Families Division/Adult Social Care of the allegation within 1 working day in accordance to the Referrals Procedure.

At this stage there should be no identifying information, such as name, date of birth or address recorded by the Designated Officer. It is the responsibility of the Employer to record the outcome of the advice provided to them and act upon it.

If the decision is made between the Employer and Designated Officer that the criteria is not met for a MASM investigation then the Designated Officer should write to the Employer providing a written rationale as to why that decision was made. It is expected that the Employer would store this information on the individual's personnel file for future reference if required.

Records will be kept in a restricted area by the Designated Officer of any consultations or MASM referrals which do not progress, for the purposes of identifying any patterns of concern in regards to individuals or agency settings.

Once a referral has been made to Children and Families Division/Adult Social Care the Designated Officer should immediately be notified and kept informed of any progress made. Where there is deemed to be a risk to the child/vulnerable adult, inter-agency procedures should be invoked with the process of investigation initiated.

Very many allegations will not need an immediate protective response and are rarely so straight forward as to allow conclusions to be made immediately.

The Designated officer will consider if the concern falls within the scope of the MASM procedure. If so, it is the responsibility of the Designated Officer to ensure that a MASM meeting is convened within 2 working weeks of receiving the allegation.

The MASM meeting

The Designated Officer, or other identified officers should chair the initial MASM meeting and oversee all strands of the investigations into the allegation.(e.g. Police, Employer, Social Care).

Simultaneously the progress of investigations should be incorporated into the meeting. The meeting plans the response to the allegation against the adult and any actions taken by agencies, such as whether the child or adult at risk requires protection or support services and any actions to be taken by the employer towards the MASM subject

Possible risks to other children or vulnerable adults (the adult's own children or other settings the adult may be connected with) must be taken into account during the MASM meeting.

Support arrangements for the person subject to the allegation and what information is to be shared with them is to be considered by the MASM. An identified support person from their Employment will be identified in the MASM and the Chair will write to them following the meeting to make them aware they are subject to the process and who their support and point of contact (through their employment) will be whilst the process is ongoing.

Arrangements for sharing information with parents/carers should be discussed within the meeting. Before sharing information with a vulnerable adult, (for example, the outcome of the investigation) it is important that there is an assessment of their capacity to be able to understand the information being shared with them. For children, young people, vulnerable adults, parents and carers it is important to consider what additional support may be required to help them understand the MASM process, findings from the investigation and the agreed final outcome.

It is important that the requirements of the investigations being conducted by the Children and Families Division/Adult Social Care are not confused with the broader requirements of the MASM meeting but do inform it.

In all circumstances the Designated Officer will monitor the progress of the case, with the expectation that where applicable the police, Children's/Adult Services and the employer will provide updates of the investigation or any disciplinary process.

It is difficult to place achievable timescales for the MASM process to conclude as the timeframes for different investigations vary, for example if there is a requirement for medical forensic evidence or if there is a need for electronic devices to be examined.

The primary focus throughout must remain on the child or vulnerable adult but it is necessary to recognise that information and judgements about the adult who is subject to the allegation should be made as soon as possible to enable the MASM to conclude through the outcome meeting.

MASM outcome meeting

Throughout the MASM process the Designated Officer, or other identified officers should monitor and oversee the collation of strands of the investigation and chair the outcome meeting. A summary document should then be completed and should include details of:

- The allegation;
- How it was followed up and by whom, including the child/vulnerable adult's account and the alleged subject's account;
- The outcome reached;
- Action taken;

The MASM outcome meeting will draw together all relevant information following the completion of all enquiries by the police, employer, Children and Families Division/Adult Social care Services.

The Police should inform the Designated Officer of the conclusion of any criminal investigation, and it should be recorded. If charges were made, what those charges were, and the outcome of the prosecution or caution process.

If no charges were made or a caution wasn't administered, the reasons and information supporting that decision.

In the event that the police have not interviewed the adult, the adult must always be given the opportunity to answer the allegation. The Designated Officer should discuss with the Employer what action is appropriate in all cases where it is clear at the outset or decided by a strategy discussion that the investigations by the police or enquiries by Children and Families Division/Adult Social Care are not necessary.

A lack of criminal investigation, a charge or conviction is not an adequate defence for the adult who is subject to MASM. There may be elements of an allegation which suggest a breach of expected or appropriate standards of behaviour or propriety, even when no criminal activity is identified, and the MASM must decide whether the person is suitable to work with children or vulnerable adults in their continued employment. In these circumstances the MASM meeting should consider the evidence on the 'balance of probabilities.' It should be remembered the MASM does not issue sanctions but determines a collective professional judgement. Any action following from the judgement is the responsibility of the employer.

If the person who is subject to the allegation refuses to cooperate with enquiries they should continue and decisions should be made on what is known.

If an adult was charged but acquitted all relevant information pertaining to the outcome should be considered so that any impact and remedial action can be considered.

The MASM outcome meeting should discuss and clearly record both the criteria into which the allegation falls, and establish the evidence on the balance of probabilities, where there is not a conviction:

- Harm or may cause harm;
- Conviction/caution;
- Unsuitable behaviour;

The outcome categories are:

- **Substantiated** – this is an allegation supported or established by evidence or proof;
- **Unsubstantiated** – this is an allegation where there is insufficient evidence to neither prove or disprove the allegation, and neither indicates guilt of innocence.
- **Unfounded** – this is an allegation that was misinterpreted or mistaken by the person making the allegation. To be unfounded there will need to be sufficient evidence to disprove the allegation.
- **Malicious or deliberately invented** – this is an allegation that was misinterpreted or mistaken by the person making the allegation. For an allegation to be classed as malicious there will need to be sufficient evidence to prove this intention.

The meeting should consider all the information shared to reach an outcome and recommend a future course of action. For example, an investigation may conclude a specific allegation is unsubstantiated but that the inquiry has sufficient evidence to indicate that the adult's behaviour is of sufficient concern that they are unsuitable to work with children or vulnerable adults. Or the behaviour indicates a need to monitor the professional conduct upon a return to work, or to provide training for them to return to work. In which case a contingency threshold for what is to be achieved should be established including what will occur if similar allegations are made in the future.

Following the outcome meeting, the Designated Officer will write to the MASM subject to inform them of the outcome of the process and that the process has concluded. They will be advised / sign posted to their support person within their employment in this letter to seek follow up discussions and support in connection with the MASM/Allegation.

6. Disciplinary Process

Discussion about suspension should take place at appropriate stages of the investigation. Whilst professionals may offer a view and the Designated Officer will provide an opinion based on an assessment of continued risk, it is ultimately the decision of the employer, in accordance with their HR policies.

Suspension should not be an automatic response to an allegation; alternative strategies to safeguard the individual and the child/vulnerable adult should always be considered.

Suspension should be considered in circumstances where:

- There is cause to suspect a child or vulnerable adult is at ongoing risk of harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it meets the threshold for gross misconduct under internal HR policies

The possible risk of harm should be evaluated and managed in respect of those involved and any other children/vulnerable adults in the accused member of staff's home, work or community life.

Should the decision be made by the employer to suspend then this should be regarded as a precautionary act to protect all parties.

Resignations and 'compromise agreements'

Every effort should be made to reach a conclusion in all cases even if:

- The individual refuses to cooperate, having been given a full opportunity to answer the allegation and make representations;
- It may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete.

Compromise agreements' must not be used, for example, where a member of staff agrees to resign provided that disciplinary action is not taken and that a future reference is agreed. A settlement/compromise agreement which prevents the employer from making a DBS referral when the criteria are met for doing so could potentially result in a criminal offence being committed for failure to comply with the duty to refer. The employer must make a referral to the Disclosure and Barring Service to consider whether to add the individual to the barred list. This applies irrespective of whether a referral has been made to the Children and Families Division or the Adult Social Care or Designated Officers.

Organised abuse

Investigators should be alert to signs of organised or widespread abuse and/or the involvement of other perpetrators or institutions. They should consider whether the matter should be dealt with in accordance with complex abuse procedures which, if applicable, will take priority. [See Organised and Complex Abuse Procedure.](#)

Whistle-blowing

All staff should be made aware of the organisation's whistle-blowing policy and feel confident to voice concerns about the attitude or actions of colleagues. See Whistle-blowing Procedure

If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by their organisation, they should report the matter to the Designated Officer.

Timescales

It is in everyone's interest for cases to be dealt with expeditiously, fairly and thoroughly and for unnecessary delays to be avoided.

7. Unsubstantiated, Unfounded, Malicious or Deliberately invented Allegations

Where it is concluded the allegation is unsubstantiated, advice should be given to the employer of the implications of this to enable them to consider what further action, if any should be taken.

Unfounded or deliberately invented allegations are rare and may be a strong indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably unfounded the employer, in consultation with the Designated Officer should decide whether to refer the matter to the Children and Families Division (if a child made the allegation) to determine whether the child is in need of services, or might have been abused by someone else. A vulnerable adult will need to be supported by a professional to understand the reasons for making a malicious/deliberately invented allegation with additional support potentially provided to prevent a recurring allegation.

If it is established that an allegation has been deliberately and maliciously invented, the police could be asked to consider what action might be appropriate.

8. Substantiated Allegations and Referral to DBS

If the allegation is substantiated and the person concerned is dismissed, (or deregistered, if a childminder or foster carer) or if the employer ceases to use the person's services, or they resign, **and** the conclusion is that they are **unsuitable to**

work with children or vulnerable adults then the employer should make a referral to the Disclosure and Barring Service and their professional regulatory body. They will consider whether the adult should be barred or have conditions imposed upon them in respect of working with children and vulnerable adults.

A referral should always be made if the employer thinks that the individual has harmed, or poses a risk of harm to children or vulnerable adults.

If a referral is appropriate, it should be made within one month. It is the responsibility of the employer to make the referral. The Designated Officer should provide support to do so where necessary. Employers should consult the Disclosure and Barring Service in the Department of Home Affairs for more information.

If the adult is self-employed the role of the employer will be conferred on the organisation commissioning the service.

If the adult is a foster carer the role of the employer is conferred on the Children and Families Division.

If through the course of the MASM process the Designated Officer has concerns about the actions of any party in the investigation and has been unable to resolve them the concerns should, in the first instance be discussed with their manager and if agreed be escalated. [See Resolving Professional Difficulties Procedure](#)

9. Record Keeping

A clear and comprehensive summary of the MASM record must be retained and held in a computerised restricted file within the Safeguarding and Quality Assurance Unit/Adult Safeguarding Team.

The outcome grounds and category with supporting reasons should be kept by the employer along with a clear and comprehensive summary of any allegations made. Details of how the allegation was followed up as an employment issue, and details of any action taken and decisions reached should be recorded on a person's confidential personnel file. A copy should be given to the employee (subject to the allegation). Such information should be retained on file in line with the retention policy of the organisation. The record will provide accurate information for any future reference and provide clarification if a future DBS disclosure reveals an allegation that resulted in a prosecution or conviction. The record will prevent unnecessary re investigation if the allegation should resurface after a period of time.

Details of allegations that are found to be malicious should be removed from personnel records.

The record is intended to protect both children/vulnerable adults and the individual subject to the allegation and should provide:

- Accurate information for any reference;
- Clarification if a future DBS disclosure reveals a conviction or prosecution;
- Enable patterns of behaviour which may pose a risk to children and vulnerable adults to be identified over time;
- Prevent unnecessary re-investigation if the allegation re-surfaces.

Suitability Checks

If a suitability check request is sent to Safeguarding and Quality Assurance Unit/Adult Safeguarding Team and the person has been subject to MASM, it is the Designated Officers responsibility to respond to the information request and to determine what information is relevant to be shared in line with the check. That the person was subject to MASM should only be shared if the allegation was **Substantiated**.

10. Learning Lessons and complaints

At the conclusion of a case in which an allegation is substantiated the employer should review the circumstances of the case to determine whether there are any improvements to be made to the organisations procedure or practice to help prevent similar events in the future. This should include issues arising from any decision to suspend a member of staff, the duration of the suspension or whether or not suspension was justified.

The Designated Officer will be responsible for notifying the Safeguard Board of any themes noted in respect of MASM. Anonymised quantitative data relating to the number of MASMs and number of substantiated outcomes will be provided to the Board to inform identification of any themes. This data and relevant narrative must be reported in the Safeguarding Board Annual Report.

The MASM is not an investigatory process itself; therefore any complaint regarding the outcome of the MASM by the MASM subject would need to consider which investigation into the allegation their complaint is about and the relevant agencies complaint procedure then be utilised.

If a complaint is made about an investigation which has informed the MASM and the outcome of the complaint changes the information involved and/or the outcome of the investigation, the MASM will be re-run by the Designated Officer as this may impact the MASM outcome.

If a complaint is made regarding the conduct of the Designated Officer by the MASM subject in respect of the MASM, this would be dealt with through Manx Care's complaint procedure.

Managing Allegations Strategy Meeting (MASM) Referral Form

Allegations against people who work with children

This form is to be used in cases where it is alleged that an adult who works with children or vulnerable adults (either paid / unpaid/ self-employed) in a position of authority and/or trust has:

- Behaved in a way that has harmed a child or vulnerable adult, or may have done so;
- Possibly committed a criminal offence against or related to a child or vulnerable adult;
- Behaved in a way that indicates he or she may pose a risk of harm to children or vulnerable adults;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable adults.

If the allegation meets any of the above criteria, the employer should report it to the Designated Officer using this form within 1 working day.

AGENCY reporting form for ALLEGATIONS against staff and volunteers working with children and young people	
Date of referral	
Referrer's name and job title	
Place of work and address	
Tel number	
Email	

The subject of the allegation					
Name		DOB		Gender	
Address				Ethnicity	
Job Title (please say whether this is a permanent					

employee, agency member of staff or volunteer)			
Date of alleged incident		Date allegation reported to referrer	
Details of allegation: (Please also specify if there have been any previous allegations against this individual)			

Action taken by the referrer / employer/ voluntary agency	
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Details of potential victim/child			
Name of child / young person making the allegation		DOB	
Gender		Additional Needs	
Language / Ethnicity			
Address			
Name of parent / carer		Contact Number	
Names and DOB of any other children at risk			

Language		Ethnicity	
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Additional Information				
	Yes	No	N/A	Additional comments if needed
Has there been a delay in the reporting of concerns?				
Are the parents/carers aware of the allegations?				
Is the child/YP aware of the referral to MASM				
Does the child/YP have a disability?				
Does the child/YP have an allocated social worker?				
Is the child subject to a CP or LAC process?				
Has the YP/child made any previous allegations?				

Please send this completed form to Safeguarding.Unit@gov.im. If you wish to discuss this referral before submission please contact the unit on 686259.

Managing Allegations Strategy Meeting (MASM) Referral Form

Allegations against people who work with adults

This form is to be used in cases where it is alleged that an adult who works with adults or vulnerable adults (either paid / unpaid/ self-employed) in a position of authority and/or trust has:

- Behaved in a way that has harmed an adult or vulnerable adult, or may have done so;
- Possibly committed a criminal offence against or related to an adult or vulnerable adult;
- Behaved in a way that indicates he or she may pose a risk of harm to adults or vulnerable adults;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with adults or vulnerable adults.

If the allegation meets any of the above criteria, the employer should report it to the Designated Officer using this form within 1 working day.

AGENCY reporting form for ALLEGATIONS against staff and volunteers working with adults and vulnerable adults					
Date of referral					
Referrer's name and job title					
Place of work and address					
Tel number					
Email					
The subject of the allegation					
Name		DOB		Gender	
Address				Ethnicity	

<p>Job Title of the subject of the allegation (please say whether this is a permanent employee, agency member of staff or volunteer)</p>			
<p>Date of alleged incident</p>		<p>Date allegation reported to referrer</p>	
<p>Details of allegation: (Please also specify if there have been any previous allegations against this individual)</p>			
<p>Action taken by the referrer / employer/ voluntary agency</p>			
<p>Details of potential victim</p>			
<p>Name of adult making the allegation</p>		<p>DOB</p>	

Gender		Additional Needs	
Language / Ethnicity			
Address			
Name of parent / carer		Contact Number	
Names and DOB of any other adults or vulnerable adults at risk			
Language		Ethnicity	

Additional Information				
	Yes	No	N/A	Additional comments if needed
Has there been a delay in the reporting of concerns?				
Are family members/carers aware of the allegations?				
Is the adult aware of the referral to MASM				
Does the adult have a disability?				
Does the adult have an allocated social worker?				
Has capacity been considered?				
Has the adult made any previous allegations?				

Please send this completed form to MASMReferrals@gov.im